

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

DWAYNE FURLOW et al.,

Plaintiffs,

v.

JON BELMAR et al.,

Defendants.

Case No.: 4:16-cv-00254-JAR

MOTION TO CONTINUE AND RESCHEDULE ORAL ARGUMENT

Plaintiffs Dwayne Furlow, Howard Liner, and Ralph Torres (“Plaintiffs”), by and through their attorneys, hereby move the Court to continue and reschedule oral argument on Defendants’ Motion for Summary Judgment (Doc. No. 77), Plaintiffs’ Motion for Partial Summary Judgment (Doc. No. 84), and Plaintiffs’ Motion for Class Certification (Doc. No. 80), which is currently scheduled for January 19, 2018 at 10:00 am (Doc. No. 114).

Plaintiffs respectfully submit that good cause exists for this motion. Plaintiffs’ counsel begins a several-week-long jury trial in the United States District Court for the District of New Jersey on January 18, 2018 and would be unable to appear before this Court on January 19th. Plaintiffs have consulted with Defendants’ counsel, who does not object to this motion, and who informed Plaintiffs that he has a trial scheduled to begin February 5, 2018. Accordingly, Plaintiffs respectfully request that the Court reschedule oral argument on the three motions to any time during the week of February 26, 2018 that is convenient to the Court.

WHEREFORE, for the foregoing reasons, Plaintiffs respectfully request that the Court grant their motion to continue and reschedule oral argument.

Dated: November 29, 2017

Respectfully submitted,

Paul, Weiss, Rifkind, Wharton & Garrison LLP

By: /s/ Eric Alan Stone

Eric Alan Stone (pro hac vice)
Timothy J. Holland (pro hac vice)
Charles J. Hamilton III (pro hac vice)
Elizabeth Grossman (pro hac vice)
PAUL, WEISS, RIFKIND,
WHARTON & GARRISON LLP
1285 Avenue of the Americas
New York, NY 10019
Tel: 212.373.3000
Fax: 212.492.0326
tholland@paulweiss.com
estone@paulweiss.com
chamilton@paulweiss.com
egrossman@paulweiss.com

and

Baher Azmy (pro hac vice)
Darius Charney (pro hac vice)
Omar Farah (pro hac vice)
Angelo Guisado (pro hac vice)
CENTER FOR CONSTITUTIONAL RIGHTS
666 Broadway, 7th Floor
New York, New York 10012
Tel: 212-614-6464
Fax: 212-614-6499
bazmy@ccrjustice.org
dcharney@ccrjustice.org
ofarah@ccrjustice.org
aguisado@ccrjustice.org

and

Thomas B. Harvey #61734MO
Michael-John Voss #61742MO
Blake A. Strode #68422MO
Nathaniel R. Carroll #67988MO
ARCHCITY DEFENDERS, INC.
1210 Locust Street, 2nd Floor
St. Louis, MO 63103
Tel: 855-724-2489
Fax: 314-925-1307

tharvey@archcitydefenders.org
mjvoss@archcitydefenders.org
bstrode@archcitydefenders.org
ncarroll@archcitydefenders.org

Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing was served upon all parties of record by this Court's PACER/ECF electronic notification system on this 29th day of November, 2017:

/s/ Eric Alan Stone
Eric A. Stone